

**IN THE UNITED STATES DISTRICT COURT
FOR THE DISTRICT OF MARYLAND**

UNITED STATES OF AMERICA	:	
	:	
v.	:	Criminal No. AMD-04-029
	:	
WILLIE MITCHELL, et al.	:	
	...	

**GOVERNMENT'S MOTION FOR EXTENSION OF
TIME TO RESPOND TO DEFENSE MOTIONS**

The United States of America, by and through its undersigned counsel, moves this court for an extension of time to file its response to the defendants' motions for a new trial, and states as follows:

1. Undersigned counsel received motions for a new trial from defendants Martin, Harris and Gardner filed on December 15 or December 16, 2008.
2. Undersigned counsel took substantial time off over the holidays, and Mr. Hanlon has already completed another trial in *United States v. Thurmond Brown* before Judge Nickerson on January 8, 2009. Mr. Harding starts trial in *United States v. Sean Bundy* before Judge Legg on January 26, 2009.
3. The government has requested, and counsel for Harris, Martin and Gardner have all consented to, a continuance of the sentencing dates for their clients to dates after mid-March, 2009.

Wherefore, the government requests an extension until February 9, 2009 to submit its responses.

Respectfully submitted,

Rod J. Rosenstein
United States Attorney

By: /s/
Robert R. Harding

____/s/_____
Michael Hanlon

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CERTIFICATE OF SERVICE

I certify that on this 14th day of January, 2009, the Government's Motion for an Extension of Time was electronically filed and served and sent by e-mail to the following:

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